



August 25, 2023

**VIA ECF**

The Honorable J. Paul Oetken  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Yury Mosha, 21 CR 92 (JPO)

Dear Judge Oetken,

I write this letter on behalf of defendant, Yury Mosha, in the above-referenced case to renew his request for an extension of time for him to surrender to the Bureau of Prisons ("BOP") by 90 days, until December 5, 2023. After Your Honor denied, without prejudice, Mr. Mosha's initial request for a 90-day extension to surrender (R. 274), he obtained a 3-page letter from his doctor explaining the necessity of the November 10, 2023 medical procedure that was discussed in his August 14, 2023 request for adjournment.

The newly obtained letter from his doctor was provided to the government and will be subsequently provided to this Court, under seal, following the filing of the instant letter motion. Based on the representations and information contained in the letter, the government now consents to the 90-day extension of time to surrender request.

Regarding his state court matter, it is the undersigned understanding that the District Attorney's Office will now consent to adjourning his sentencing date until either mid-to-late December 2023 or January 2024. As such, in addition to the 90-day extension of time to surrender to the BOP, Mr. Mosha and the government jointly ask that this Court recommend to the BOP that Mr. Mosha be asked to surrender to either Brooklyn-MDC or another BOP facility in the New York metro area, as opposed to FCI Allenton where he was designated to report. To that end, the parties also ask that the BOP permitted to remain in that facility until either the end of January 2024 or the date of Mr. Mosha's sentencing in his state court matter, whichever occurs first.



The reason for this request is to keep Mr. Mosha in the vicinity of the New York Supreme Court (where he will be sentenced in the state matter) and available to be taken from BOP custody on the day of the writ directly to court. Should Mr. Mosha be required to surrender to FCI Allenton, or any other BOP facility outside of the New York City metro area, the District Attorney's Office would need to seek a writ which would require BOP to transport Mr. Mosha back to the New York City area. Having the BOP keep Mr. Mosha in the New York City metro area would obviate that logistical burden on both the District Attorney's Office and the BOP. To be fair, it is also in Mr. Mosha's interest that he is not constantly moved around during the first month or so of his surrender.

For those reasons, Mr. Mosha respectfully asks Your Honor to extend his surrender date by 90 days and further order that the BOP allow him to surrender to Brooklyn-MDC or another BOP facility in the New York area and be kept there until the end of January 2024 or until the date of his state sentencing, whichever occurs first.

Thank you in advance for your consideration.

Respectfully submitted,

*Vadim A. Glozman*

Vadim A. Glozman

Granted. Defendant's date of surrender is hereby extended to December 5, 2023.

The Court recommends to the BOP that Defendant be allowed to surrender to MDC Brooklyn or another BOP facility in the New York City metropolitan area. The Court further recommends that the BOP allow Defendant to remain in that facility until January 31, 2024, or until sentencing in Defendant's state court matter has concluded, whichever occurs first.

So ordered.

8/29/2023

A handwritten signature in blue ink, appearing to read 'J. Paul Oetken', written over a horizontal line.

J. PAUL OETKEN  
United States District Judge